

MARKMAN LAW

DAVID MARKMAN (Nev. Bar. No. 12440)
David@Markmanlawfirm.com
4484 S. Pecos Rd., Suite #130
Las Vegas, Nevada 89121
Telephone: (702) 843-5899
Facsimile: (702) 843-6010

GUTRIDE SAFIER LLP

SETH A. SAFIER (admitted *pro hac vice*)
seth@gutridesafier.com
MARIE A. MCCRARY (admitted *pro hac vice*)
marie@gutridesafier.com
HAYLEY REYNOLDS (admitted *pro hac vice*)
hayley@gutridesafier.com
ANTHONY J. PATEK (admitted *pro hac vice*)
anthony@gutridesafier.com
KALI BACKER (admitted *pro hac vice*)
kali@gutridesafier.com
100 Pine Street, Suite 1250
San Francisco, CA 94111
Telephone: (415) 336-6545
Facsimile: (415) 449-6469

Attorneys for Plaintiffs

CAMPBELL & WILLIAMS

J. COLBY WILLIAMS (Nev. Bar No. 5549)
jcw@cwlawlv.com
710 South Seventh Street, Suite A
Las Vegas, Nevada 89101
Telephone: (702) 382-5222
Facsimile: (702) 382-0540

PAUL HASTINGS LLP

SUSAN K. LEADER (admitted *pro hac vice*)
susanleader@paulhastings.com
ALI R. RABBANI (admitted *pro hac vice*)
alirabbani@paulhastings.com
STEPHANIE V. BALITZER (admitted *pro hac vice*)
stephaniebalitzer@paulhastings.com
1999 Avenue of the Stars, 27th Floor
Los Angeles, CA 90067
Telephone: (310) 620-5700
Facsimile: (310) 620-5899

Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EVERETT BLOOM, JACK GRAHAM,
AND DAVE LINDHOLM, on behalf of
themselves, and those similarly situated,

Plaintiffs,

v.

ZUFFA, LLC; ENDEAVOR
STREAMING, LLC; and ENDEAVOR
GROUP HOLDINGS, INC.

Defendants.

Case No.: 2:22-cv-00412-RFB-BNW

**JOINT STIPULATION TO EXTEND
MOTION TO DISMISS BRIEFING
SCHEDULE AND [PROPOSED] ORDER**

(First Request)

1 Pursuant to LR 7-1 and LR IA 6-1, Plaintiffs Everett Bloom, Jack Graham, and Dave
2 Lindholm (collectively, “Plaintiffs”) and Defendants Endeavor Streaming, LLC and Endeavor
3 Group Holdings, Inc. (collectively, the “Endeavor Defendants”) (together, the “Parties”) hereby
4 stipulate to extend the briefing schedule on the Endeavor Defendants’ Motion to Dismiss, which
5 was filed on June 28, 2023. This is the Parties’ first stipulation regarding the Motion to Dismiss
6 briefing schedule.

7 WHEREAS, on May 29, 2023, Plaintiffs filed the First Amended Class Action
8 Complaint (“FAC”) (ECF No. 47);

9 WHEREAS, on June 28, 2023, the Endeavor Defendants filed a Motion to Dismiss the
10 claims asserted against them in the FAC (ECF No. 60);

11 WHEREAS, Plaintiffs’ current deadline to file an Opposition to the Motion to Dismiss is
12 July 12, 2023, and the Endeavor Defendants’ current deadline to file a Reply Brief in Support of
13 Motion to Dismiss is July 19, 2023;

14 WHEREAS, Plaintiffs believe additional time is necessary due to a family emergency
15 that required the absence of Plaintiffs’ counsel Kali Backer for several weeks, leaving Plaintiffs’
16 counsel short-staffed;

17 WHEREAS, Plaintiffs’ counsel has requested and Zuffa’s counsel has agreed that
18 Plaintiffs’ deadline to file an Opposition should be extended by two weeks to a total of four
19 weeks from the date of the Motion to Dismiss (i.e., to July 26, 2023), and the Endeavor
20 Defendants’ deadline to file a Reply Brief should be extended by two weeks to a total of three
21 weeks from the date of the Opposition (i.e., to August 16, 2023).

22 **THEREFORE**, the Parties hereby stipulate and agree that the briefing schedule on the
23 Endeavor Defendants’ Motion to Dismiss shall be extended as follows:

- 24 • Plaintiffs’ Opposition to the Endeavor Defendants’ Motion to Dismiss will be due by
25 July 26, 2023;
- 26 • The Endeavor Defendants’ Reply Brief in Support of the Motion to Dismiss will be
27 due by August 16, 2023; and
28

- Nothing in this stipulation shall be construed as a waiver of any of Defendants' rights or defenses, including, without limitation, jurisdictional defenses.

STIPULATED AND AGREED to this 10th day of July 2023.

By: /s/ Anthony J. Patek/
GUTRIDE SAFIER LLP
 Seth A. Safier
 Marie A. McCrary
 Hayley Reynolds
 Anthony J. Patek
 Kali Backer
 100 Pine Street, Suite 1250
 San Francisco, California 94111

MARKMAN LAW
 DAVID MARKMAN (Nev. Bar. No. 12440)
 David@Markmanlawfirm.com
 4484 S. Pecos Rd., Suite #130
 Las Vegas, Nevada 89121
 Telephone: (702) 843-5899
 Facsimile: (702) 843-6010

Attorneys for Plaintiffs

By: /s/ Ali Rabbani/
PAUL HASTINGS LLP
 Susan K. Leader
 Ali R. Rabbani
 Stephanie V. Balitzer
 1999 Avenue of the Stars, 27th Floor
 Los Angeles, California 90067
 Telephone: (310) 620-5700
 Facsimile: (310) 620-589

CAMPBELL & WILLIAMS
 J. COLBY WILLIAMS (Nev. Bar No. 5549)
 jcw@cwlawlv.com
 710 South Seventh Street, Suite A
 Las Vegas, Nevada 89101
 Telephone: (702) 382-5222
 Facsimile: (702) 382-0540

Attorneys for Defendants

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 12th day of July, 2023.